

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**ROBERT MITCHELL,**

Plaintiff,

**Hon. Lawrence J. Zatkoff**

vs.

**Case No. 2:05 cv 73698**

**COUNTY OF WAYNE, KAREN KREYGER and  
HAROLD CURETON,**

Defendants.

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LAWRENCE J. DEBRINCAT (P43338)  
DeBrincat and Padgett  
Attorney for Plaintiff  
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Corporation Counsel for Wayne County  
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Attorneys for Defendant Wayne County  
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**CONFIDENTIALITY AGREEMENT AND  
PROTECTIVE ORDER**

At a session of said Court, held in the  
City of Detroit, County of Wayne  
State of Michigan, held on:  
May 17, 2006

Present: LAWRENCE J. ZATKOFF  
U.S. District Court Judge

Pursuant to the stipulation of the parties, IT IS ORDERED:

1. This agreement and order governs all information disclosed, produced or submitted by Defendants to any other party in connection with this action relating to employees or former employees of Wayne County, other than Plaintiff. All such information is hereby designated as “confidential” and

may only be used for purposes of this action. Every person to whom disclosure of such confidential information is made will be advised of this protective order and is subject to it.

2. Furthermore, this agreement and order governs all information disclosed, produced or submitted by Defendants to any other party in connection with this action relating to inmates or former inmates of the Wayne County Jail. All such information is hereby designated as “confidential” and may only be used for purposes of this action. Every person to whom disclosure of such confidential information is made will be advised of this protective order and is subject to it.

3. Identifying information of a highly personal nature such as social security numbers, personal addresses, personal telephone numbers, the names of children, spouses and other family members, and medical conditions shall be redacted or removed and not disclosed.

4. Plaintiff’s counsel may disclose to Plaintiff information designated by Defendants as confidential only to the extent necessary for the prosecution of this action. Plaintiff will not divulge or discuss the information or contents of the confidential information with anyone except her attorney.

5. If information designated as confidential is filed with the Court for motion practice, in support or defense of a motion, in mediation, or in any other pretrial presentation to the Court, such papers referring to the confidential information shall be filed with the Court in a sealed envelope bearing the designation “Confidential.” The parties do not waive any rights they may have to object to the use of any document or information at or prior to trial and/or to assert any privilege.

6. At the conclusion of this litigation, all documents produced and any copies of documents produced by Defendants and subject to this order, except documents contained in Plaintiff’s personnel file, shall be returned to defense counsel.

7. A violation of this Order may give rise to appropriate sanctions against any person who

causes, contributes to or participates in such a violation, including but not limited to a finding or contempt and the assessment of damages, costs and attorney's fees.

s/Lawrence P. Zatkoff  
Hon. Lawrence J. Zatkoff  
District Court Judge

s/ Lawrence J. DeBrincat w/ permission  
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